

Safety and Airspace Regulation Group

Airspace Change Process

Post Implementation Review Data Request (Scaled)

ACP Project Reference:	ACP-2019-58		
Title of Airspace Change:	Llanbedr Danger Area		
Change Sponsor:	Snowdonia Aerospace		
CAA Decision Document:	Airspace Change Portal Llanbedr		
CAA Decision Date:	13 Aug 21	AIRAC Date(s):	09 Sep 21
PIR Data Submission Requested:	22 Oct 25	PIR Data Submission Required by:	22 Jan 26

Introduction

1. The CAA's airspace change process is a seven-stage mechanism that is set out in detail in CAP 1616. Stage 7 of this process is a Post Implementation Review (PIR) that normally begins one year after implementation of the change. The PIR is an assessment of whether the anticipated impacts and benefits in the approved change and published decision are as expected and where there are differences, what steps (if any) the CAA requires to be taken.
2. Irrespective of whether the CAA decision to approve the change was made under the previous process (set out in CAP 725), all PIRs should normally be in accordance with the process requirements of CAP 1616. However, when assessing the expected impacts against the actual impacts, the methodology adopted at the time of the original CAA decision should be used.
3. Airspace Change Proposals can vary in size, scale and complexity, which has led the CAA to scale the PIR process appropriately. A PIR of Level 2 changes will be undertaken when it is proportionate to do so. For some changes, the CAA may proportionately reduce the extent of evidence and data required from the change sponsor or allow more flexibility in the format of the data required¹.
4. This data request form sets out that list of data required for the CAA to complete the assessment for a scaled PIR. On receipt of this data request form, the change sponsor should provide qualitative statements against each of the general observations listed below. The date on which the CAA requires the data to be submitted is stipulated at the top of this document.

¹ CAP 1616 – Para 294, 295 & Appendix H
APR-AC-TP-041

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General Observations

1. The following general observations are to enable an overview of the effectiveness of the airspace change.
2. The change sponsor is required to submit a qualitative statement against each data request which supports the conclusion reached in each case.
3. The CAA will review the analysis of the data submitted to ensure the anticipated impacts and benefits in the approved change were as expected.

- a) An overview statement on whether, in the change sponsor's view, the original proposal met the intended objectives as described on the CAA's decision to approve the change.

The original proposal successfully met its intended objectives in the initial phase by providing segregated airspace that enabled safe RPAS and test operations. Over time, however, increasing business and operational demand has highlighted constraints, particularly the cap on maximum activation days, which has reduced flexibility and limited the ability to fully achieve the objectives in the longer term

- b) An overview statement on whether, in the change sponsor's view, the original proposal met any conditions described on the CAA's decision to approve the change (if applicable).

In our view, the conditions set out in the CAA's approval decision have been met to date. Compliance has been maintained with the specified operational limits, including the cap on maximum activation days. While this restriction has not yet materially affected operations, projected increases in business and activity scheduled for the coming year indicate that the limit will become a constraint, reducing flexibility and potentially limiting the ability to fully achieve the intended objectives in the longer term.

- c) Confirm that implementation occurred on the dates identified in the Decision Letter. If no implementation date was specified in the Decision, please state so.

Implementation of the airspace change for EG D217 occurred on the dates identified in the CAA's Decision Letter, and no deviations from the approved timeline were required.

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- d) If there was a significant delay between the planned and actual implementation date, please provide an explanation.

There was no significant delay between the planned and actual implementation date. The airspace change for EG D217 was implemented in September 2021 in line with the date specified in the CAA's Decision Letter

- e) Identify whether any other issues of significance have occurred during the period 12 months after date of implementation.

No other issues of significance were identified during the 12-month period following implementation. Operations within EG D217 proceeded as planned, with compliance maintained and no material impacts reported in relation to safety, environment, or stakeholder engagement

- f) Other than normal promulgation activity (e.g. NOTAM, AIC etc.), identify what steps were undertaken to notify local aviation stakeholders that the airspace change was about to be implemented.

In addition to standard promulgation activity (NOTAMs, AICs), Snowdonia Aerospace undertook a structured notification process to ensure local aviation stakeholders were informed of the forthcoming implementation of EG D217. This included a 14-day advance notification email to all identified local stakeholders, followed by a 7-day reminder email.

A NOTAM was then issued with at least 24 hours' notice prior to activation. On each day of activation, direct phone calls were made to specific stakeholders to confirm activity and ensure awareness. This layered approach ensured timely communication and effective stakeholder engagement beyond normal promulgation channels.

- g) Feedback/complaints received from stakeholders, aviation stakeholders or the Ministry of Defence by the change sponsor in the period between implementation and post-implementation review (including feedback/complaints received via an FCS 1522 Form (UK Airspace Access or Refusal of ATS Report)).

No feedback or complaints were received from aerodrome stakeholders, aviation stakeholders, or the Ministry of Defence during the period between implementation and this post-implementation review.

Furthermore, no reports were submitted via the FCS 1522 process (UK Airspace Access or Refusal of ATS Report) related to this change.

Engagement with key stakeholders has indicated that the change has been implemented without adverse operational or safety impacts.

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Other information of relevance (if appropriate)

- h) Confirm that the condition of limitation of which areas can be activated and when has been adhered to and whether this condition remains achievable longer term.

The condition limiting which areas of EG D217 can be activated, and when, has been fully adhered to since implementation. This has not presented any significant operational challenges and remains achievable for the longer term. Activation has been managed effectively in line with the approved parameters, and the condition continues to support safe and efficient operations.

In addition to maintaining compliance with the current area limitations, Snowdonia Aerospace requests that consideration be given to reviewing the vertical ceiling of EG D217. Increasing the ceiling would better accommodate the operational requirements of RPAS and test activities, ensuring that the objectives of the airspace change can continue to be fully achieved as demand grows.

Snowdonia Aerospace requests that consideration be given to extending the vertical limit of EG D217 from the current 6,000 ft to 15,000 ft. As EG D217 is already structured into multiple vertical blocks (A–K), any extension would be implemented by adding further blocks above the current ceiling.

This would allow activation only of the specific blocks required for each operation, thereby minimising unnecessary impact on other airspace users while providing the flexibility needed to accommodate RPAS and test activities at higher altitudes. Extending upward over the areas of water would be free from the ground risk constraints over land which would be worthy of consideration.

- i) Confirm that the condition of limitation on number of calendar days of activation has been adhered to and whether this condition remains achievable longer term.

The condition limiting the number of calendar days of activation has been fully adhered to since implementation. While this has not yet materially constrained operations, forecast increases in business and operational demand scheduled for the coming year indicate that maintaining adherence to this limit will become increasingly challenging. Snowdonia Aerospace will continue to manage activations carefully to remain compliant.

However, in order to ensure that the objectives of the airspace change can continue to be fully achieved, consideration may need to be given to lifting or increasing the current restriction on activation days to better align with operational demand.

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For CAA use only

In providing a response for each general observation, please ensure that the 'status' column is completed using the following options and that they are colour coded accordingly:

YES • NO • PARTIALLY • N/A

A summary of any issues arising should be provided against each question in the appropriate text box.

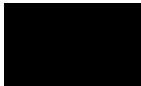
General Observations	Status
a) Has the change sponsor indicated that the original proposal met the intended objectives as described on the CAA's decision to approve the change?	Yes
The sponsor states that the proposal successfully met its original objective of providing segregated airspace to facilitate safe RPAS and aerospace test operations. Whilst future growth may create pressure on some approval conditions, the approved airspace has delivered the intended operational and safety benefits.	
b) Has the change sponsor indicated that the original proposal met any conditions described on the CAA's decision to approve the change (if applicable)?	Yes
The sponsor confirms continued compliance with the conditions attached to the approval, including adherence to activation limits and operational restrictions. No evidence of non-compliance has been identified.	
c) Did the implementation occur on the date(s) identified in the Decision Letter?	Yes
The sponsor confirms implementation occurred in accordance with the timescales specified within the CAA Decision Letter and that no deviation from the approved implementation date occurred.	

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General Observations	Status
d) Was there a significant delay between the planned and actual implementation date?	No
The sponsor confirms there was no delay between the approved implementation date and actual implementation. EG D217 was implemented in September 2021 as approved.	
e) Has there been any other issues of significance that occurred during the period 12 months after date of implementation?	No
The sponsor reports no significant operational, safety, environmental or stakeholder issues during the review period. Operations proceeded as planned and no material concerns have been identified	
f) Other than normal promulgation activity (e.g. NOTAM, AIC etc.), were there any steps undertaken to notify local aviation stakeholders that the airspace change was about to be implemented?	Yes
The sponsor undertook a structured stakeholder communication process including 14-day and 7-day advance notification emails, NOTAM publication and activation-day stakeholder telephone calls. This exceeded standard promulgation requirements.	
g) Were there any feedback/complaints received from stakeholders, aviation stakeholders or the Ministry of Defence by the change sponsor in the period between implementation and post-implementation review?	No
The sponsor reports no complaints or adverse feedback from aviation stakeholders, aerodromes, the Ministry of Defence or through the FCS1522 process since implementation.	

Other information of relevance (if appropriate)	Status
h) Confirm that the condition of limitation of which areas can be activated and when has been adhered to and whether this condition remains achievable longer term.	Yes
The sponsor confirms that all area activation restrictions have been complied with since implementation and remain achievable. The sponsor has, however, highlighted a potential future requirement to raise the vertical ceiling of the danger area to support anticipated RPAS and test activity growth. This does not affect current compliance with the approval. This request is out of scope for a PIR and may require a separate ACP due to the initial indication of over double the current airspace volume and infringement into the Valley Aerial Tactics Area. The sponsor has been advised to contact the CAA separately for this request.	
i) Confirm that the condition of limitation on number of calendar days of activation has been adhered to and whether this condition remains achievable longer term.	Yes
The sponsor confirms continued compliance with the activation-day limitation. However, forecast growth in operations may make long-term adherence increasingly challenging and the sponsor has indicated that the restriction may require future review. Current compliance has been maintained, but concerns have been raised regarding future sustainability.	

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General Summary and recommendation	
Based on the above, does the CAA Project Officer recommend that this concludes the PIR assessment for this ACP?	Yes
The evidence provided demonstrates that ACP-2019-58 has achieved the intended operational and safety objectives, that implementation occurred as approved, that all conditions have been complied with, and that no adverse stakeholder, safety, environmental or operational impacts have arisen. Although future operational growth may generate a requirement for a separate airspace change relating to activation limits or vertical dimensions, these matters do not affect the conclusion that the approved change has delivered the expected outcomes within acceptable tolerance limits. It is recognised that in the 5 years since implementation the demand for use of the airspace has increased along with the objectives of use. However, due to the complexity of the airspace the sponsor's request to adjust (i.e. increase in days of use, extend vertical limits from 6,000ft to 15,000ft) is out of scope for this PIR. We have suggested to the sponsor that any future changes will need to be made through the CAP 1616 process.	
Decision and Sign Off	
Based on the above, does the Decision Maker conclude that the PIR assessment for this ACP complete?	Yes
I concur that this ACP has met its objectives as approved, and the airspace change is confirmed. I also agree that in order to implement the changes mentioned by the sponsor in the PIR report, they would need to commence a new ACP under CAP1616.	
Signed:  Name:   Principal Airspace Regulator (delete as applicable)	
Date: 10/08/2026	